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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER DISASTER SITE LITIGATION

IN RE WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION

IN RE COMBINED WORLD TRADE CENTER AND LOWER MANHATTAN DISASTER SITE LITIGATION

STIPULATED ORDER OF DISMISSAL WITH PREJUDICE PURSUANT TO FINAL SETTLEMENT AGREEMENT

RICHARD AALBUE, *et al.*,

Plaintiffs,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

21 MC 100 (AKH)
21 MC 102 (AKH)
21 MC 103 (AKH)

THIS STIPULATED ORDER PERTAINS TO ALL PLAINTIFFS AND DOCKET NUMBERS SET FORTH ON EXHIBIT A

IT IS HEREBY STIPULATED AND AGREED by and between certain Plaintiffs represented by Worby Groner Edelman & Napoli Bern, LLP, identified on Exhibit A hereto ("Plaintiffs"), and the Defendants identified on Exhibit B ("Settling Defendants") that:

1. Plaintiffs and Settling Defendants have entered into a settlement agreement resolving all claims by Plaintiffs against Settling Defendants in the above-captioned action.

2. Plaintiffs have executed releases and covenants not to sue in which Plaintiffs have released the Settling Defendants and each of them from any and all obligations and liability to Plaintiffs for past, present, and future injuries arising out of or relating in any way to World Trade Center-related rescue, recovery and/or debris-removal operations and/or clean-up at any

location on and/or after September 11, 2001. Accordingly, Plaintiffs' claims against the Settling Defendants and each of them shall be dismissed, and hereby are dismissed, with prejudice;

3. The Primary Plaintiffs identified on Exhibit A also have executed before a notary public documents evidencing their understanding that they are foreclosed from suing the Settling Defendants or any of them in the future for currently unknown, future injuries arising out of or relating in any way to World Trade Center-related rescue, recovery and/or debris-removal operations and/or clean-up at any location on and/or after September 11, 2001, regardless of whether such currently unknown, future injuries arise out of or relate in any way to the injury(ies) each Primary Plaintiff has pleaded in this action. Such understanding shall be, and hereby is, judicially noticed.

WORBY GRONER EDELMAN &
NAPOLI BERN, LLP

By: ______________________
Paul J. Napoli, Esq.
Attorneys for Plaintiffs
350 5th Avenue, Suite 7413
New York, NY 10118

Dated: January 25, 2011

PATTON BOGGS LLP

By: ______________________
James E. Tyrrell, Jr., Esq.
Attorneys for all Defendants
The Legal Center
One Riverfront Plaza, Suite 600
Newark, NJ 07102

Dated: January 25, 2011

SO ORDERED, this 25 day of Jan, 2011,

ALVIN K. HELLERSTEIN
United States District Judge